



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 2, 2022

Via ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. James Bradley and Arwa Muthana, 21 Cr. 277 (PAE)

Dear Judge Engelmayer:

Consistent with the Court's instruction at the June 21, 2022 conference (Tr. at 8) requiring the Government to update the Court and defense counsel as to its review and production of emails and phone calls obtained from the Metropolitan Detention Center (the "MDC"), the Government provides the following update.

As the Court is aware, the Government has implemented a process whereby a filter team has reviewed the defendants' emails and phone calls obtained from the MDC for potentially privileged materials prior to making such materials available to the prosecution team. The Government has also been producing to each defendant their own unfiltered emails and phone calls in discovery.

Since the June 21, 2022 conference, the Government has produced (i) 59 additional unfiltered MDC calls and 1,740 pages of unfiltered emails to Bradley (USAO_JB_PP_001764), and (ii) 1,695 pages of unfiltered MDC emails to Muthana (USAO_AM_PP_000002 to USAO_AM_PP_001721).

Upon the defendants' consent to cross-production of filtered (*i.e.*, non-privileged) MDC materials, the Government has also made a production this week consisting of the filtered MDC calls and emails of Bradley and Muthana to the other defendant's counsel (USAO_ 141243 to

USAO_144922). The Government has now reviewed and produced all MDC emails and calls in its possession.

Respectfully submitted,

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cc: Defense Counsel (by ECF)